

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
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This document relates to:

Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq et. al., No. 1:04-cv-01076 (GBD)(SN)

Estate of John P. O'Neill, Sr., et al. v. Al Baraka Investments & Development Corp., et al., No. 1:04-cv-01923 (GBD)(SN)

Celestine Kone, et al. v. Islamic Republic of Iran, No. 1:23-cv-05790 (GBD)(SN)

**MOTION TO SUBSTITUTE PARTIES PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 15(d)**

Pursuant to Federal Rules of Civil Procedure 15(d), Plaintiffs herein move the Court to allow substitution of the party identified in Exhibit A in the above referenced actions. The individual being substituted into the cases is the Personal Representative of an immediate family member of an individual killed as a result of the terrorist attacks on September 11, 2001.

Exhibit A identifies the individual to be substituted in the pleadings, including the capacity in which they seek to be substituted, state of residency at the time the complaint was filed, the existing pleading that refers to the plaintiff, and the 9/11 decedent.

Plaintiffs propose that, upon endorsement of Plaintiffs' Proposed Order, the substituted parties be individually entered as a Plaintiff into the Court's ECF system to ease the burden on the Clerk of the Court's Office and the size of this MDL.

Dated: July 29, 2025

/s/ Jerry S. Goldman

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EXHIBIT A to Motion to Substitute Party

	Previous Personal Representative:	Case Number:	Substituted Personal Representative:	State of Residency of Substituted Personal Representative at Filing:	Decedent's Name:
1.	Estelle Pershep, individually, as surviving spouse of Franklin Pershep	1:04-cv-01076 (GBD)(SN); 1:04- cv-01923 (GBD)(SN); 1:23-cv-05790 (GBD)(SN)	Stacy Paolozzi, as the Personal Representative of the Estate of Estelle Pershep, deceased, the late spouse of Franklin Pershep	NY	Franklin Pershep